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March 1, 2019

Via Hand Delivery

Honorable Jacqueline Scott Corley
United States District Court
Northern District of California
450 Golden Gate Avenue, 15th Floor
San Francisco, CA 94102

**Re: Planet Aid, Inc., et al. v. Reveal, et al.,
Case No. 3:17-cv-03695-MMC (JSC)**

Dear Judge Corley:

We represent Defendants in this action.

As directed by your February 26, 2019 Order (Dkt. 203), please find enclosed for *in camera* review an unredacted recording of the October 20, 2016 phone call between Matt Smith and Harrison Longwe that was the subject of the discovery dispute. The recording is encrypted; the password required to access it is **SD*qw3489af##**

For the Court's convenience, we also attach a transcript of the call, with the redacted portions highlighted. We note that Defendants never produced the transcript to Plaintiffs. Only the redacted recording was provided to Plaintiffs, and only the recording is at issue in this dispute.

As the Court will see, one redacted portion (4:1-7:17) is not related to Plaintiffs at all. The other portion (1:20-2:4) relates to activities of Plaintiffs that were not the subject of the publications at issue in this case and the facts in this redacted portion were never the subject of any other publication. In addition, the phone call (October 20, 2016) occurred many months after the key publications at issue (March 19, 2016 and May 23, 2016).

Very truly yours,


Ethan Forrest

Cc: Samuel Rosenthal (Plaintiff's counsel), without enclosures (via ECF)